

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

IN RE:

Maria D. Ponce

Debtor(s)

Case No.: 16-40877

Chapter: 13

Judge Timothy A. Barnes

NOTICE OF FORBEARANCE AGREEMENT DUE TO THE COVID-19 PANDEMIC

NOW COMES PennyMac Loan Services, LLC (“Creditor”), by and through undersigned counsel, and hereby submits this Notice of Forbearance Agreement to the Court regarding the Debtor’s request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently requested a forbearance period of 3 months in which the Debtor will not tender mortgage payments to Creditor that would come due on the mortgage starting 05/01/2020 through 07/01/2020. Creditor holds a secured interest in real property commonly known as 3624 W. 56th Street, Chicago, IL 60629. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period after the forbearance plan ends. Furthermore, Creditor does not waive its rights under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect any post-petition escrow shortage. During the forbearance period Creditor may continue to file notices in compliance with Fed. Rule Bankr. P. 3002.1.

Because of the uncertainties surrounding how long this pandemic will last, Creditor will work with Debtor or Debtor’s counsel to determine when Debtor will be able to resume making mortgage payments and when/how the Debtor will cure the delinquency created by the forbearance period (“forbearance arrears”). Once the forbearance plan ends and the Creditor and

Debtor or Debtor's counsel agree on an appropriate repayment or loss mitigation program, Creditor will file a notice or an amended/supplemental claim consistent with local practice.

Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment of the Mortgage, including, but not limited to, a lapse in insurance coverage or non-payment of property taxes.

Respectfully Submitted,
Codilis & Associates, P.C.

By: /s/ Karl Meyer

Berton J. Maley ARDC#6209399
Rachael A. Stokas ARDC#6276349
Peter C. Bastianen ARDC#6244346
Joel P. Fonferko ARDC#6276490
Brenda Ann Likavec ARDC#6330036
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(630) 794-5300
14-16-05260

NOTE: This law firm is a debt collector.

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice of Debtor's Request for Forbearance upon the parties listed below, as to the Trustee and Debtor's attorney via electronic notice on June 12, 2020 and as to the debtor by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 before the hour of 5:00 PM on June 12, 2020.

Marilyn O Marshall, Chapter 13 Trustee, 224 South Michigan Ste 800, Chicago, IL 60604 by electronic notice through ECF

Maria D. Ponce, Debtor(s), 3624 W. 56th Street, Chicago, IL 60629

Joseph Davidson, Attorney for Debtor(s), 2500 South Highland Ave Suite 200, Lombard, IL 60148 by electronic notice through ECF

/s/ Karl Meyer

Attorney for Movant

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